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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

INSTRUCTURE, INC.,  
a Delaware corporation,

Plaintiff/  
Counterclaim-Defendant,

v.

CANVAS TECHNOLOGIES, INC.,  
a Delaware corporation,

Defendant/  
Counterclaim-Plaintiff.

Civil No. 2:21-cv-00454-DAK-CMR

**JOINT MOTION FOR STIPULATED  
ORDER REGARDING INJUNCTIVE  
RELIEF**

District Judge: Hon. Dale A. Kimball  
Magistrate Judge: Hon. Cecelia M. Romero

Defendant/Counterclaim-Plaintiff Canvas Technologies, Inc., now renamed and known as Untapped Labs, Inc. (“Untapped”), and Plaintiff/Counterclaim-Defendant Instructure, Inc. (“Instructure,” and collectively with Untapped, the “Parties”), by and through their respective attorneys, hereby jointly move the Court for the entry of a Stipulated Order as detailed below.

WHEREAS the Parties have reached agreement and have executed a written settlement agreement resolving this matter;

WHEREAS the Parties jointly request entry of a Permanent Injunction in the form of Exhibit 1 hereto prohibiting Untapped from using CANVAS or confusingly similar variations thereof as trademarks in the future; and

WHEREAS the Parties also jointly acknowledge that Untapped was in substantial compliance with the Court's preliminary injunction order (D.E. 74) as of February 10, 2022.

WHEREFORE, the Parties respectfully move the Court to issue an order in the form of Exhibit 1 hereto granting a Permanent Injunction and acknowledging Untapped's substantial compliance with the Court's preliminary injunction order (D.E. 74).

Dated: April 29, 2022

Respectfully submitted,

/s/ Mark Miller

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Attorneys for Defendant/Counterclaim-Plaintiff  
CANVAS TECHNOLOGIES, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of April 2022, a true and correct copy of the foregoing document was served on counsel of record via CM/ECF.

/s/ Sterling A. Brennan  
Sterling A. Brennan